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7 Attorney for Josemaria Rios

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JOSEMARIA RIOS,

15 Defendant.

Case No. 2:18-cr-028-RFB-VCF-2

UNOPPOSED MOTION TO
MODIFY CONDITIONS OF
PRETRIAL RELEASE

16
17 The defendant, Josemaria Rios, by and through his counsel of record, Raquel Lazo,
18 Assistant Federal Public Defender, files this Unopposed Motion to Modify Conditions of
19 Pretrial Release. This request is based on the Points and Authorities attached hereto.

20 DATED this 12th day of September, 2018.

21 RENE L. VALLADARES
Federal Public Defender

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23 By: /s/Raquel Lazo

24 RAQUEL LAZO
Assistant Federal Public Defender
Attorney for Josemaria Rios
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1 **POINTS AND AUTHORITIES**

2 1) On January 22, 2018, this court released Mr. Rios on a personal recognizance
3 bond with conditions. *See* PR Bond (#14). One of the conditions required that Mr. Rios submit
4 to location monitoring with GPS. *Id.* (condition #51).

5 2) Mr. Rios requests that the location monitoring condition be removed. He has
6 been subject to location monitoring for nearly eight months. He has been fully compliant with
7 that condition as well as all his other conditions.

8 3) Mr. Rios intends of pleading guilty to the charges. He will be filing a Notice of
9 Intent to Plead Guilty without the benefit of a plea agreement in advance of his calendar call.

10 4) Defense counsel has been in contact with Mr. Rios' pretrial officer. She has
11 confirmed his compliance and has no opposition.

12 5) Defense counsel has also been in contact with the government. Government
13 counsel submits it to the Court's discretion.

14 Dated this 12th day of September, 2018.

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16 Respectfully submitted,

17 RENE L. VALLADARES
18 Federal Public Defender

19 By: /s/Raquel Lazo

20 RAQUEL LAZO
21 Assistant Federal Public Defender
22 Attorney for Josemaria Rios
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 JOSEMARIA RIOS,

8 Defendant.
9

Case No. 2:18-cr-028-RFB-VCF

ORDER

10
11 IT IS ORDERED that Mr. Rios' pretrial release conditions shall be modified to remove
12 his location monitoring condition (#51).

13 DATED this 12th day of September, 2018.
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16 UNITED STATES MAGISTRATE JUDGE
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That on September 12, 2018, he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

/s/ *Brandon Thomas*
Employee of the Federal Public Defender